



ORIGINAL



## Correspondence

FRIDAY, JULY 24, 1998

VIA E-MAIL/OVERNIGHT MAIL

Secretary, Federal Trade Commission  
Sixth and Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

**SUBJECT:** Subject: 16 CFR Part 423 – Care Labeling Rule

Dear Secretary:

These comments are provided by the National Coalition of Petroleum Dry Cleaners (NCPDC). NCPDC was formed in 1997 as a result of the need to differentiate the petroleum dry cleaning process from a dry cleaning process using perchlorethylene (PERC). NCPDC currently represents two hundred and fifty leading petroleum dry cleaners in the United States. Over three thousand petroleum dry cleaners are operating plants today.

The dry cleaning industry primarily uses two solvents: perchlorethylene, petroleum solvents, and two others banned in 1995 including chlorofluorocarbons (CFC-113), and trichloroethane (TCA). Most environmental, safety, and health standards only apply to other dry cleaning solvents like PCE and not petroleum solvents used in our industry. We ask that the Federal Trade Commission consider this important fact when finalizing the Care Labeling Rule.

The NCPDC members provide garment-cleaning services and in most cases will provide related services such as clothes pressing and finishing. The dry cleaning process is physically similar to the home laundry, but you will understand from our comments that the process has many variables that can effect the quality of the cleaning and the life of the garment if done improperly in a home environment.

The NCPDC believes that the proposed changes to the Care Labeling Rule and the supporting information is not correctly depicted by the Federal Trade Commission. NCPDC believes that further technological studies and process verification on alternative dry cleaning options is necessary and that a sound economic and environmental impact analysis be completed and made available to the public for review before the proposed changes to the Care Labeling Rules can be adopted by the Commission.

NCPDC comments will support our opinion that all economic, environmental and technological variables have to be considered for an analysis that best suits the American public. In one section of the proposed rules, the Consumer's Union states; *"If only one method must appear on the label, it has to be the least expensive and the least hazardous to the consumer and the environment."* WE DO NOT SUPPORT THIS OPINION.

A simple analysis demonstrates that no washing at all would be the least expensive and most environmentally beneficial method of care for any garment. However, this position is flawed and shortsighted in our opinion. It is

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similar to the decision of consumers who choose not to change the oil in their motor vehicles. In the long-term, the cost of no action can be much greater than the cost of proper maintenance.

When discussing the least expensive cleaning process and most environmentally beneficial method to care for a garment, the initial investment in the garment must be considered in the analysis. If a consumer purchases a beautiful and colorful silk scarf, for example, and chooses to wash the scarf at home two times, the simple analysis is that that consumer has saved the cost of two dry cleanings (excluding the cost of the consumer's time and effort). If this home cleaning process results in the loss of color and luster to the scarf and renders it undesirable for future use, the lost cost of the scarf must also be considered.

If the same consumer brought the scarf to a professional dry cleaner for both cleanings and the garment retained its color, the consumer would save money because the scarf kept its value and can be worn again. Likewise, the environmental resources of producing another scarf can be avoided.

Another factor not considered in the analysis to change the care label requirements is the cost of a lost garment due to improper spotting by the consumer cleaning at home. Should a consumer improperly or inadequately spot a garment and the dryer heat damages the garment, that damaged garment may not be worn again. By seeking a professional dry cleaner to properly seek expert advice and service, the consumer can avoid damaging garments and the replacement costs.

In summary, NCPDC does not agree that a care label recommending home washing as the preferred method of care is necessarily providing the consumer with the best method of cleaning their garments. NCPDC does not agree with the FTC that this will also help our environment due to the potential for increased solid waste from damaged garments and increased water quality issues due to higher detergent usage by consumers who are choosing to wash their garments at home. Again, NCPDC believes that further technological studies and process verification on alternative dry cleaning options is necessary and that a sound economic and environmental impact analysis be completed and made available to the public for review before the proposed changes to the Care Labeling Rules can be adopted by the Commission. We ask the FTC re-consider the proposed changes to the Care Labeling Rule and support strongly that proper professional dry cleaning is the best option and investment for consumers conscious of maximizing the life-span of their investment in fine clothing garments.

We thank the Commission for the opportunity to provide these comments and NCPDC is available to answer your questions regarding our position.

Sincerely,



Russell K. Snyder  
Executive Director

Cc: NCPDC Steering Committee  
Robert Portman, Jenner & Block  
RDS